

Jay Bennett
Director
Public Participation Relations

1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 383-5425
Fax: (202) 347-0320

EX PARTE OR LATE FILED

PACIFIC  TELESIS
Group Washington

June 20, 1996

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 95-116*

Today, the attached letter was delivered to Chairman Hundt describing the advantages of allowing the use of "Query on Release" for number portability. Please associate this material with the above-referenced docket.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions.

Sincerely,



Attachment

cc: Chairman Hundt
Commissioner Chong
Commissioner Ness
Commissioner Quello
Regina Keeney
Geraldine Matise
Rose Crellin
Richard Metzger
Mindy Littell
Susan McMaster
Jeannie Su
Karen Brinkmann

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JUN 20 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

071

June 19, 1996

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET #

EX-100-116

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JUN 20 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Chairman Hundt,

The purpose of this letter is to inform you of our position on Local Number Portability (LNP). Various number portability solutions have been presented in industry forums during the past year and are currently being investigated under Common Carrier Docket Number 95-116. Our view is that, while the addressing and routing scheme to ensure nationwide completion of all calls must be standardized, the approaches to database queries and architectures for LNP may vary based upon call volumes and infrastructure capabilities. In particular, we want to bring to your attention the concept of "Query on Release" (QOR) and the potential of this alternative to reduce costs and network requirements of LNP significantly, particularly in the introduction of LNP when the volumes of calls to ported numbers are expected to be relatively small. After careful evaluation of these alternatives we have concluded that Query On Release represents a data base querying alternative that addresses the needs of both customers and service providers. At this time, we believe this capability will allow us to significantly reduce the costs of LNP by reducing the number of queries sent to the LNP database. The economics associated with this reduction in queries are compelling. We believe that reducing the costs of LNP is in the public and national interest and for that reason, we urge the Commission to endorse the option of QOR for LNP.

Allowing us to use the QOR capability will not delay implementation of LNP. Bellcore has published draft QOR requirements which are currently under review by the industry. Representatives of the entire industry have been invited to participate in the review and comment cycle of these requirements. A final set of requirements for local service provider portability, including those for QOR, will be published by Bellcore in July. In addition, QOR is compatible with the proposed LRN (N-1) architecture. Our request is consistent with the expected ruling from Canada, that addressing information should be standardized, and that use of a query reduction mechanism like QOR is not precluded.

Switch vendors have stated that the LRN (N-1, as defined by the Illinois Commerce Commission) capability will be delivered in 2Q97. However, the commission should be careful in setting an implementation date based on the delivery dates already established by the vendors since this delivery date is based on the LRN (N-1) requirements developed by the Illinois Commerce Commission (ICC). These requirements have not been endorsed by any of us. In fact, these requirements were developed solely by the participants involved in the Illinois order and are incomplete and have resulted in differing assumptions and interpretations by various switch

vendors. In addition, this may well result in future problems in implementing LNP. For this and other reasons, we strongly support using the Bellcore requirements to provide the industry requirements for LRN (N-1) and QOR¹. Switch vendor delivery dates should be reconfirmed based on the Bellcore requirements document and should be available by the end of July. It is our understanding that three of the four major switch vendors will deliver both LRN (N-1) and QOR, as defined in the standard Bellcore switch requirements, in the same time frame.

Additionally the Commission should consider all other activities and milestones which need to be accomplished for successful and reliable implementation for a project of this magnitude. For this reason the commission should consider all other activities and milestones outside switch development including information systems, management systems, billing, interoperability testing, and a host of other activities.

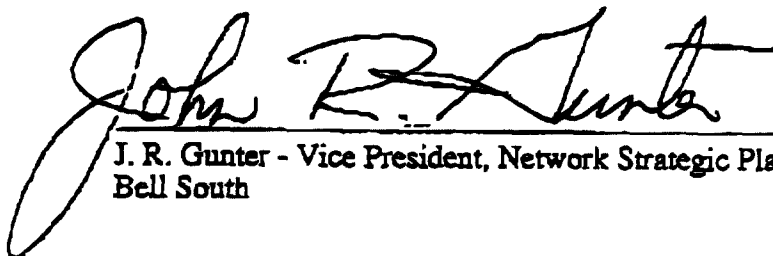
In conclusion we urge the Commission to not preclude us from implementing number portability in a way that helps contain costs by reducing the number of queries we must perform in a portability environment, while allowing numbers to be freely "ported" between service providers.

Sincerely,



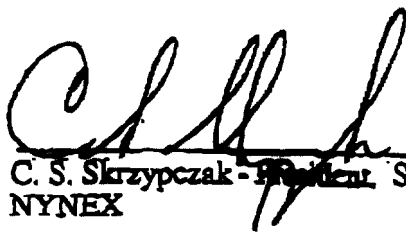
for

J. W. Seasholtz - Chief Technology Officer
Bell Atlantic

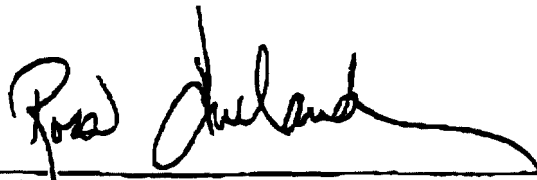


J. R. Gunter - Vice President, Network Strategic Planning and Support
Bell South

1. The Canadian industry has worked their own standards which include QOR.



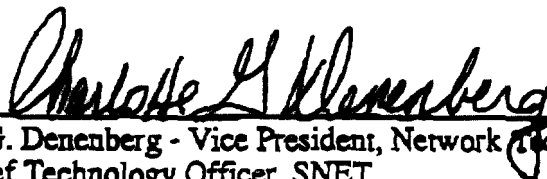
C. S. Skrzypczak - President, Science and Technology
NYNEX



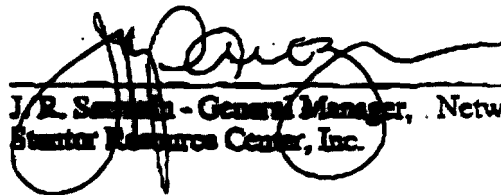
R. K. Ireland - Vice President, Network Engineering
Pacific Bell



J. Walkowiak - Senior Vice President, Network
SBC Telecommunications, Inc.



C. G. Denenberg - Vice President, Network Technology and
Chief Technology Officer, SNET



J. R. Samaha - General Manager, Network Regulatory Research
Santor Resources Center, Inc.